



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

March 8, 2011

Garland E. Hilliard
Olin Corporation
Suite 200
3855 N. Ocoee Street
Cleveland, TN 37312

Kimberly Lesniak
Associate General Counsel
EPEC Polymers, Inc.
1001 Louisiana Street
Houston, TX 77002

Gary Ballesteros
Associate General Counsel
For Global Compliance
Rockwell Automation, Inc.
1201 S. 2nd Street
Milwaukee, WI 53202

Dear Sirs:

The enclosed collection invoice is submitted to you by the U.S. Environmental Protection Agency (EPA) for payment of the costs outlined therein. This invoice includes an accounting of future response costs incurred by EPA for activities pertaining to the Ordnance Works Disposal Area Site, Morgantown, WV. This invoice is solely for the recovery of EPA's future response costs. Any fines and/or penalties due will be billed separately.

EPA seeks recovery of the future response costs contained in the enclosed invoice pursuant to the provisions of the Consent Decree, Civil Action No. 1:02CV177 and Civil Action No. 1:03CV29 Section VI p.13. Attached to the enclosed invoice is a Narrative Cost Summary Report entitled, "Future Response Bill Costs from 01/01/09 to 12/31/10 dated February 28, 2011. The report provides an accounting of future response costs incurred by the United States in connection with the site for which EPA seeks reimbursement.

The stated amount of \$14,234.59 (\$30,592.30 x 46.53%) is due to be paid on or before May 12, 2011. Please review and adhere to all procedures and requirements, as specified in the Consent Decree for making payment and for disputing all or part of the costs contained in the invoice. Section VI.13 requires all uncontested future response costs to be paid within 60 days and contested amounts shall be placed in an interest bearing escrow account. Please make your check payable to:

EPA-Hazardous Substance Superfund

Customer Service Hotline: 1-800-438-2474

Forward your payment to:

EPA Region III
Superfund Payments
Cincinnati Finance Office
P.O. Box 979076
St. Louis, MO 63197-9000

If express mail or a messenger service will be used to deliver your payment, the street address of our bank is below:

Environmental Protection Agency RIII
P.O. Box 979076
U.S. Bank
Mail Station SL-MO-C2GL
1005 Convention Plaza
St. Louis, MO 63101

To send an EFT (wire transfer):

Federal Reserve Bank of New York
ABA No. 021030004
Account No. 68010727
SWIFT Address FRNYUS33
33 Liberty Street
New York, NY 10045
Note: Field Tag 4200 of the Fedwire message should read "D 68010727
Environmental Protection Agency

To enable EPA to accurately record receipt of your payment by the established due date, the following information must be included on the face of your payment check:

Site Name/Location: Ordnance Works Disposal Area Site, Morgantown, WV
Account Number: 03B5BF00
Receivable Account Number: 2731126S056
Civil Action No. 1:02CV177 and 1:03CV29

Interest will accrue at the current rate of .069% on any amounts unpaid by the due date. Failure to comply with the payment requirements will subject the respondent to stipulated penalties as outlined in Section VIII (Stipulated Penalties). Non compliance will also result in further collection efforts, including the referral of the debt to the Department of Justice.

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Any questions or problems regarding this billing should be directed to:

Andrew Goldman
U.S. Environmental Protection Agency (3RC41)
1650 Arch Street
Philadelphia, PA 19103
(215) 814-2487

Thank you for your cooperation.

Sincerely,

A handwritten signature in cursive script that reads "Barbara A. Borden".

Barbara A. Borden
Office of the Comptroller

Enclosures



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

BILL FOR COLLECTION

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1001 Louisiana Street
Houston, TX 77002

<u>BD Number</u>	<u>Date</u>	<u>Amount</u>
2731126S056	March 8, 2011 (\$30,592.30 X 46.53%)	\$14,234.59
	Total	\$14,234.59

Description: Recovery of future response costs from 1/01/09 to 12/31/10 at the Ordnance Works Disposal Area Site, Morgantown, WV pursuant to the Consent Decree, Civil Action No. 1:02CV177 and 1:03CV29, Section VI.13. A Narrative Cost Summary Report is attached.

Payment Due Date: May 12, 2011

Please include the BD number on your remittance check.

Forward your payment to: EPA, Region III
Superfund Payments
Cincinnati Finance Office
P.O. Box 979076
St. Louis, MO 63197-9000

Interest will be assessed at the rate of .069% on any amounts unpaid by the due date. Please review and adhere to all procedures and requirements, as specified in Section VI and VI.13 for making payment and/or for disputing all or part of the costs contained in the cost summary.

BD 2731126S056 2011 TR2B BD45 RC26 03B5BF00 CR11

Customer Service Hotline: 1-800-438-2474

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Narrative Cost Summary

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL

COSTS FROM 01/01/09 TO 12/31/10

1. The United States Environmental Protection Agency has incurred at least \$12,227.02 for Regional Payroll Costs.
2. The United States Environmental Protection Agency has incurred costs of at least \$-266.64 for INTERAGENCY AGREEMENT (IA) COSTS contract expenditures. The total represents the amount spent under the ARMY CORPS OF ENGINEERS contract.
3. The United States Environmental Protection Agency has incurred costs of at least \$7,496.66 for INTERAGENCY AGREEMENT (IA) COSTS contract expenditures. The total represents the amount spent under the ARMY CORPS OF ENGINEERS contract.
4. The United States Environmental Protection Agency has incurred at least \$11,135.26 for Indirect Costs.

Total Site Costs:

\$30,592.30

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Itemized Cost Summary

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10

REGIONAL PAYROLL COSTS	\$12,227.02
INTERAGENCY AGREEMENT (IA) COSTS	
ARMY CORPS OF ENGINEERS (DW96944117)	(\$266.64)
ARMY CORPS OF ENGINEERS (DW96944294)	\$7,496.66
EPA INDIRECT COSTS	\$11,135.26
Total Site Costs:	<u>\$30,592.30</u>

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Regional Payroll Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
ARNOLD, DARIA D. OPERATING ACCOUNTANT	2010	08	0.50	29.48
			<u>0.50</u>	<u>\$29.48</u>
KELLY, DARLENE F. ENVIRONMENTAL PROTECTION SPECIALIST	2010	12	2.25	139.94
		14	2.00	124.39
			<u>4.25</u>	<u>\$264.33</u>
LEONARD, PAUL H. ENVIRONMENTAL ENGINEER	2010	17	0.25	23.18
			<u>0.25</u>	<u>\$23.18</u>
MATTA, CHRISTIAN ENVIRONMENTAL SCIENTIST	2010	08	9.00	557.72
		16	3.00	185.91
		19	5.00	309.85
		20	13.00	805.59
		21	32.00	2,063.19
		22	20.00	1,304.79
		23	11.50	741.46
		24	22.00	1,418.44
		25	22.00	1,418.43
		26	13.00	838.16
		27	6.00	385.69
	2011	01	10.00	646.34
		04	5.00	323.59
			<u>171.50</u>	<u>\$10,999.16</u>
MCCALL, DIANE	2010	08	2.00	97.73
MALANCONI, DIANE		12	0.50	24.43
FINANCIAL SPECIALIST		13	2.00	97.73
		15	3.00	146.59
			<u>7.50</u>	<u>\$366.48</u>
PANDZA, STEVEN X. ACCOUNTANT	2010	09	0.75	45.19
			<u>0.75</u>	<u>\$45.19</u>

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Regional Payroll Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL

COSTS FROM 01/01/09 TO 12/31/10

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Hours</u>	<u>Payroll Costs</u>
PLUTA, BRUCE ENVIRONMENTAL SCIENTIST	2010	19	1.00	70.48
			<u>1.00</u>	<u>\$70.48</u>
RANDOLPH, VIRGINIA E.	2010	08	0.25	12.86
ROWE, VIRGINIA E.		15	5.25	269.96
FINANCIAL SPECIALIST		19	0.25	12.86
			<u>5.75</u>	<u>\$295.68</u>
STEPHENS, MARK K. ENVIRONMENTAL ENGINEER	2010	19	2.00	133.04
			<u>2.00</u>	<u>\$133.04</u>
Total Regional Payroll Costs			<u>193.50</u>	<u>\$12,227.02</u>

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Contract Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10INTERAGENCY AGREEMENT (IA) COSTS

Federal Agency: ARMY CORPS OF ENGINEERS
IAG Number: DW96944117
Project Officer(s): MATTA, CHRISTIAN
Dates of Service: From: 03/01/2010 To: 05/07/2010
Summary of Service:
Total Costs: \$-266.64

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
278348 1	03/23/2010	-265.07	REFUND 03/23/2010	-265.07
34015971	06/27/2010	3.66	ACHC10195 07/16/2010	3.66
278348 1	08/10/2010	-5.23	REFUND 08/10/2010	-5.23
			Total:	<u>\$-266.64</u>

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Contract Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10INTERAGENCY AGREEMENT (IA) COSTS

Federal Agency: ARMY CORPS OF ENGINEERS
 IAG Number: DW96944294
 Project Officer(s): MATTA, CHRISTIAN
 Dates of Service: From: 09/03/2009 To: 11/01/2010
 Summary of Service:
 Total Costs: \$7,496.66

<u>Voucher Number</u>	<u>Voucher Date</u>	<u>Voucher Amount</u>	<u>Treasury Schedule Number and Date</u>	<u>Site Amount</u>
34015384	03/05/2010	972.11	ACHC10068 03/11/2010	972.11
34015512	03/05/2010	1,037.22	ACHC10068 03/11/2010	1,037.22
34015628	03/05/2010	236.17	ACHC10068 03/11/2010	236.17
34015837	04/19/2010	360.25	ACHC10113 04/27/2010	360.25
34015976	06/25/2010	1,903.64	ACHC10182 07/06/2010	1,903.64
34016118	06/25/2010	1,280.00	ACHC10182 07/06/2010	1,280.00
34016687	10/26/2010	1,100.49	ACHC10306 11/04/2010	1,100.49
34016888	12/08/2010	606.78	ACHC10347 12/15/2010	606.78
Total:				<u>\$7,496.66</u>

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EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL

COSTS FROM 01/01/09 TO 12/31/10

<u>Fiscal Year</u>	<u>Direct Costs</u>	<u>Indirect Rate(%)</u>	<u>Indirect Costs</u>
2010	16,779.84	57.23%	9,603.10
2011	2,677.20	57.23%	1,532.16
	<u>19,457.04</u>		
Total EPA Indirect Costs			<u>\$11,135.26</u>

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EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
ARNOLD, DARIA D.	2010	08	29.48	57.23%	16.87
			29.48		\$16.87
KELLY, DARLENE F.	2010	12	139.94	57.23%	80.09
		14	124.39	57.23%	71.19
			264.33		\$151.28
LEONARD, PAUL H.	2010	17	23.18	57.23%	13.27
			23.18		\$13.27
MATTA, CHRISTIAN	2010	08	557.72	57.23%	319.18
		16	185.91	57.23%	106.40
		19	309.85	57.23%	177.33
		20	805.59	57.23%	461.04
		21	2,063.19	57.23%	1,180.76
		22	1,304.79	57.23%	746.73
		23	741.46	57.23%	424.34
		24	1,418.44	57.23%	811.77
		25	1,418.43	57.23%	811.77
		26	838.16	57.23%	479.68
		27	385.69	57.23%	220.73
			10,029.23		\$5,739.73
MCCALL, DIANE	2010	08	97.73	57.23%	55.93
		12	24.43	57.23%	13.98
		13	97.73	57.23%	55.93
		15	146.59	57.23%	83.89
			366.48		\$209.73

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EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10PAYROLL DIRECT COSTS

<u>Employee Name</u>	<u>Fiscal Year</u>	<u>Pay Period</u>	<u>Payroll Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
PANDZA, STEVEN X.	2010	09	45.19	57.23%	25.86
			45.19		\$25.86
PLUTA, BRUCE	2010	19	70.48	57.23%	40.34
			70.48		\$40.34
RANDOLPH, VIRGINIA E.	2010	08	12.86	57.23%	7.36
		15	269.96	57.23%	154.50
		19	12.86	57.23%	7.36
			295.68		\$169.22
STEPHENS, MARK K.	2010	19	133.04	57.23%	76.14
			133.04		\$76.14
Total Fiscal Year 2010 Payroll Direct Costs:			11,257.09		\$6,442.44

OTHER DIRECT COSTS

<u>Contract, IAG, SCA, Misc.NO</u>	<u>Voucher Number</u>	<u>Treasury Schedule Date</u>	<u>Site Amount</u>	<u>Annual/SMO Allocation Costs</u>	<u>Ind. Rate (%)</u>	<u>Indirect Costs</u>
DW96944117	278348 1	03/23/2010	-265.07	0.00	57.23%	-151.70
	34015971	07/16/2010	3.66	0.00	57.23%	2.09
	278348 1	08/10/2010	-5.23	0.00	57.23%	-2.99
			-266.64	0.00		\$-152.60
DW96944294	34015512	03/11/2010	1,037.22	0.00	57.23%	593.60
	34015628	03/11/2010	236.17	0.00	57.23%	135.16
	34015384	03/11/2010	972.11	0.00	57.23%	556.34
	34015837	04/27/2010	360.25	0.00	57.23%	206.17

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EPA Indirect Costs

MORGANTOWN ORDNANCE WORKS, MORGANTOWN, WV SITE ID = 03 B5

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
DW96944294	34015976	07/06/2010	1,903.64	0.00	57.23%	1,089.45
	34016118	07/06/2010	1,280.00	0.00	57.23%	732.54
			5,789.39	0.00		\$3,313.26
Total Fiscal Year 2010 Other Direct Costs:			5,522.75	0.00		\$3,160.66
Total Fiscal Year 2010:			16,779.84			\$9,603.10

PAYROLL DIRECT COSTS

Employee Name	Fiscal Year	Pay Period	Payroll Costs	Ind. Rate (%)	Indirect Costs
MATTA, CHRISTIAN	2011	01	646.34	57.23%	369.90
		04	323.59	57.23%	185.19
			969.93		\$555.09
Total Fiscal Year 2011 Payroll Direct Costs:			969.93		\$555.09

OTHER DIRECT COSTS

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
DW96944294	34016687	11/04/2010	1,100.49	0.00	57.23%	629.81

EPA Indirect Costs

FUTURE RESPONSE BILL
COSTS FROM 01/01/09 TO 12/31/10

Contract, IAG, SCA, Misc.NO	Voucher Number	Treasury Schedule Date	Site Amount	Annual/SMO Allocation Costs	Ind. Rate (%)	Indirect Costs
DW96944294	34016888	12/15/2010	606.78	0.00	57.23%	347.26
			1,707.27	0.00		\$977.07
Total Fiscal Year 2011 Other Direct Costs:			1,707.27	0.00		\$977.07
Total Fiscal Year 2011:			2,677.20			\$1,532.16
Total EPA Indirect Costs						\$11,135.26